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IDAHO DEPARTMENT  
OF HEALTH AND WELFARE

DIVISION OF  
ENVIRONMENTAL QUALITY

SEP 21 1995

224 South Arthur, Pocatello, ID 83204-3202, (208) 236-6160

Philip E. Batt, Governor

Sept. 18, 1995.

Tim Brincefield  
EPA Region 10  
HW-113  
1200 Sixth Ave.  
Seattle, Wa. 98101

Regarding: State of Idaho Comments of the Monsanto 2nd Draft of the Development and Screening of Remedial Alternatives Memorandum.

Dear Mr. Brincefield:

Thank you for the opportunity to submit comments on the DSRA. As a result of the Seattle meeting on September 13, I had an opportunity to express our concerns and point out areas where we felt clarification is needed. These comments are intended to serve as a recap of the major points discussed.

Regards

Gordon Brown  
Remediation Project Officer

gb.

enc: State of Idaho Comments on the Monsanto DSRA

cc: Mike Thomas  
Boyd Roberts

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## **State of Idaho Comments on the Monsanto 2nd Draft of the Development and Screening of Remedial Alternatives**

Prepared by Gordon Brown on Sept. 18, 1995.

Page 1-30, Section 1.4.4.4. Molybdenum, in the first paragraph, the last sentence, it is stated that Molybdenum was either not measured in groundwater samples or was measured at low concentrations. It might be more accurate to say that molybdenum was not detected or was detected at low levels.

On page 1-33, Section 1.4.6. Air Quality, in the last full paragraph of the section the relative contributions of source piles on the site are presented. To make the document more readable reference could be made to Table 3-2 on page 3-4 where the specifics of the information introduced in Section 1.4.6. are presented in detail that the reader will most likely wish to evaluate.

On page 2-3. Section 2.1.2. Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings, the PRP discusses the Monsanto Site as it relates to the UMTRCA ARAR. In our September 13th meeting we had a lengthy discussion on UTL versus UCL, standards versus specific risk based approach, and our recollection of the highest concentration of radium-226 being higher than what is presented in this section. It would appear that Monsanto utilized this section to posture for what may become a soil clean-up effort. We should give serious consideration to the material presented here and ask that Monsanto rework this section to reflect the UMTRCA information and still come away with an emphasis on proper elements of the risk based approach. This would be a good topic for our conference call.

On page 2-4, Section 2.2. On-Site Source Materials, first full paragraph after the bullet, relative contributions of on-site sources are again introduced. See the second comment above.

On page 2-7, Table 2-1, should be labeled so the reader understands the numbers presented are for incremental risk. Did we resolve in our meeting if having both the 1X and the 5X risk concentrations were beneficial or confusing? The use of this table and tables 2-2 through 2-4 need to be better integrated into the text, or more footnotes need to be included so the reader can understand what the PRP is trying to present.

On pages 2-5 through 2-11, Section 2.3, Off-Site Soils is confusing. The use of UCL and UTL as was discussed in our September 13th meeting and needs to be reworked. There is a typo on page 2-6, first full paragraph, last sentence . . . thallium should be thorium. In the second to last paragraph of this section on page 2-11, the UMTRCA ARAR issue is presented again. This segment of this section needs to be reworked in conjunction with Section 2.1.2.

There were two page 2-12s. I presume the second page was to be discarded.

On page 3-30, Table 3-11, process options for addressing On-Site Sources is presented. Posishell is absent as an option. It is acknowledged that Monsanto is experimenting with Posishell to

address Title V air quality requirements and is not being presented as an option along with compliance of treatability study requirements. Subsequent to our discussion in Seattle, within the Southeastern Idaho Region we have initiated a dialogue to resolve whether we feel the management of the On-Site Source Piles is best addressed through the State regulatory venue or through CERCLA. Please bear with us as we arrive at a decision as to the best approach. Hopefully you will be available to answer questions. What would be the ramifications of requesting that Monsanto proceed according to Superfund guidance and approach the Posishell application as a CERCLA treatability option?

On page 3-31, Section 3.4.1. On-Site Source Materials, Monsanto presents their long standing argument That the facility is an OSHA Star Facility and therefore exempt from CERCLA interference. We are unclear as to how and whether the worker issue has dropped out of the "equation." What is the status of this issue? In the second paragraph of this section it is stated that the risk assessment did not take into account the institutional controls currently in place. Have we in fact eliminated the potential for worker exposure?

On page 3-32, Section 3.4.1. On-Site Source Materials, last paragraph of the section, Monsanto presents the argument that enclosures were eliminated because of the large volume of material to be addressed. The State has failed to communicate on this point. When we requested that the PRP give further consideration to this option, it was with the understanding that there would be a combination remedy. That is to say that the larger portion of the active source pile (one that is being worked on a daily basis) would be covered, capped, or whatever, and that the active portion would be housed in a structure to allow for continued access.

On page 4-2, Section 4.1 Assembly of Technologies into Remedial Alternatives we get into the UMTRCA versus risk based elements again. See the third comment on page 1 of the comments.